

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:) Chapter 11
SEARS HOLDINGS CORPORATION, et al.) Case No: 18-23538 (RDD)
Debtors.) (Jointly Administered)

BONNIE MULLINS,)
v. Plaintiff,) Adversary Proceeding:
KMArt CORPORATION, et al.) Case No: CV-418370
Defendants.) Lake County Superior Court
State of California

[PROPOSED] ORDER MODIFYING THE AUTOMATIC STAY

Upon consideration of the Motion for Relief from Automatic heard by this Court on September 11, 2020 at 10:00 am:

IT IS HEREBY ORDERED the automatic stay of 11 U.S.C. §362(d)(1) of the United States Bankruptcy Code to be modified to permit Bonnie Mullins to continue a action against Kmart Corporation, as a subsidiary of Sears Holdings Company, (the “Debtor”), filed in Superior Court of California, County of Lake, *Bonnie Mullins v. Kmart Corp., et al.*, Case Number: CV 418370.

It is further **ORDERED** recovery by Bonnie Mullins in the above action shall be limited to the general liability insurance coverage maintained by or available to the Debtor and/or its subsidiaries; she shall not seek additional recovery from the Debtor, its subsidiaries, its estate or successors, in excess of any applicable general liability insurance policy limit(s); this court retains jurisdiction to order other further relief as this Court deems just and proper.

Dated: _____, 2020
White Plains, New York

Hon. Robert D. Drain
United States Bankruptcy Judge